

**STATEMENT OF BASIS (AI No. 18632)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0083216 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Riverside Food Distributors  
F. Christiana & Co.  
Post Office Box 68  
Marrero, Louisiana 70073

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** January 27, 2009

**1. PERMIT STATUS****A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

**B. LPDES permits – LA0083216**

LPDES permit effective date: March 1, 2004

LPDES permit expiration date: February 28, 2009

**C. Date Application Received:** August 21, 2008. An LPDES Notice of Intent (NOI) to Discharge Sanitary Wastewater was received as the renewal application for this facility. This NOI did not contain all of the information needed to draft the renewal permit as there is washwater and stormwater runoff also discharged at the facility. Therefore, additional information for the renewal permit was obtained from the previous permit and from a conversation with the facility on January 27, 2009.

**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - food distribution facility**

Riverside Food Distributors, F. Christiana & Co. is an existing food distribution facility that receives pre-packaged, frozen poultry and seafood. Packages are stored until shipped to restaurants and grocers.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: II
4. SIC code: 5142

**C. LOCATION - 7251 River Road, Marrero, Jefferson Parish**  
Latitude 29° 54' 19", Longitude 90° 07' 31"

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### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: shop washdown water, stormwater runoff and previously monitored effluent from Outfall 101  
Treatment: sump, retention pond  
Location: at the point of discharge from the retention pond located on the northwest corner of the facility (east of Outfall 101) (Latitude 29°54'19", Longitude 90°7'31")  
Flow: intermittent  
Discharge Route: unnamed ditch thence to the Harvey Canal

#### Outfall 101

Discharge Type: treated sanitary wastewater and shop, dock, truck, refrigerated box, equipment, and warehouse washdown water  
Treatment: sewage treatment plant (washdown water also goes through a grease trap)  
Location: at the point of discharge from the sewage treatment plant located on the northwest corner of the facility (west of Outfall 001) (Latitude 29°54'19", Longitude 90°7'31")  
Flow: 8,000 gpd  
Discharge Route: through Outfall 001 thence to an unnamed ditch thence to the Harvey Canal

### 4. RECEIVING WATERS

STREAM - unnamed ditch thence to the Harvey Canal

BASIN AND SEGMENT - Barataria Basin Basin, Segment 020601

DESIGNATED USES -  
a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife

### 5. TMDL STATUS

Subsegment 020601, is listed on LDEQ's Final 2006 303(d) List as impaired for fecal coliform. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Barataria Basin, those suspected causes for impairment which are not directly attributed to the food distribution facility point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Therefore, the fecal coliform impairment will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards as follows:

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### Fecal Coliform

To protect against the discharge of pollutants which may further contribute to the fecal coliform impairment cause, the fecal coliform limit is being retained on Outfall 101.

## 6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

- The outfall descriptions are being changed based on the application and a conversation with the facility on January 27, 2009.
- Visible Sheen monitoring has been changed from 1/quarter to daily.
- pH has been removed from Outfall 101.

## 7. COMPLIANCE HISTORY/COMMENTS

There have been no recent inspections at the facility.

A. DMR's were reviewed for the facility from September 2006-October 2006. All DMR's were submitted in accordance with the existing permit. The excursions found were as follows:

B. DMR Review/Excursions –

Date	Parameter	Outfall	Reported Value	Permit Limits
9/08	Fecal Coliform	101	1460 col	200/400 col./100 mL
6/08	BOD <sub>5</sub>	101	55 mg/L	45 mg/L

## 8. EXISTING EFFLUENT LIMITS

Outfall 001 – shop washdown water and stormwater runoff

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/quarter Est.	Report 1/quarter Est.
TSS	---	45 mg/L 1/quarter Grab
COD	---	125 mg/L 1/quarter Grab
Oil & Grease	---	15 mg/L 1/quarter Grab

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Soaps & Detergents	Report 1/quarter Grab	---
Visible Sheen	---	No Presence 1/quarter Observation
pH	6.0-9.0 s.u. 1/quarter Grab	

Outfall 101 – treated sanitary wastewater and dock and warehouse washdown water

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/quarter Est.	Report 1/quarter Est.
BOD <sub>5</sub>	30 mg/L 1/quarter Grab	45 mg/L 1/quarter Grab
TSS	30 mg/L 1/quarter Grab	45 mg/L 1/quarter Grab
Oil & Grease	---	15 mg/L 1/quarter Grab
Fecal Coliform	200 col./100mL 1/quarter Grab	400 col./100mL 1/quarter Grab
pH	6.0-9.0 s.u. 1/quarter Grab	

## 9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020601 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008, from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

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#### **10. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

#### **11. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

#### **12. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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### Rationale for Riverside Food Distributors

1. **Outfall 001** – shop washdown water, stormwater runoff and previously monitored effluent from Outfall 101 (estimated flow is 8,000 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
COD	---	125	Similar discharges*, LAG480000 (BPJ)
TSS	---	45	Similar discharges*, LAG480000 (BPJ)
Oil & Grease	---	15	Similar discharges*, LAG480000 (BPJ)
Soaps & Detergents	Inventory Record	---	Similar discharges*, LAG480000 (BPJ)
Oil & Grease, Visual	---	No Presence	Similar discharges*, LAG480000 (BPJ)
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges*, LAG480000 (BPJ)

**Treatment:** sump, retention pond

**Monitoring Frequency:** daily for visible sheen and quarterly for flow, TSS, COD, oil and grease, and pH at the point of discharge from the retention pond located on the northwest corner of the facility prior to mixing with other waters. Soaps and Detergents: document in a quarterly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

**Limits Justification:** Limits and monitoring frequencies are based on previous permit, current guidance for similar discharges from other industrial facilities, and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

2. **Outfall 101** – treated sanitary wastewater and shop, dock, truck, refrigerated box, equipment, and warehouse washdown water (estimated flow is intermittent)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
BOD <sub>5</sub>	30	45	Similar discharges* (BPJ), LAG540000
TSS	30	45	Similar discharges* (BPJ), LAG540000, LAG480000
Oil & Grease	---	15	Similar discharges* (BPJ), LAG480000
Fecal Coliform colonies/100ml	200	400	Similar discharges* (BPJ), LAG540000

**Treatment:** sewage treatment plant (washdown water also goes through a grease trap)

**Monitoring Frequency:** Quarterly for all parameters at the point of discharge from the sewage treatment plant located on the northwest corner of the facility prior to mixing with other waters.

**Limits Justification:** Limits and monitoring frequencies are based on the previous permit, current guidance for similar discharges from other industrial facilities, the Class II Sanitary Discharge General

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Permit, LAG540000 effective July 1, 2008, and the Light Commercial General Permit, LAG480000 effective August 1, 2001. COD (equipment washwater parameter in LAG480000, Schedule B) was not included for this outfall as BOD<sub>5</sub> should be a representative parameter for any oxygen demanding pollutants which may be discharged. pH is not being placed on this outfall as it is an internal outfall.

Note: EPA Guidelines for Metal Products & Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements for exterior equipment washwater are being placed in the permit

\* Existing permits for similar outfalls  
BPJ Best Professional Judgement  
s.u. Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

**STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

As per LAC 33:IX.2511.B.14.a-k, storm water discharges from facilities classified as SIC code 5142 are not considered to be associated with industrial activities. Therefore, and SWP3 is not included in the permit.